

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

- - - - - X  
:  
UNITED STATES OF AMERICA : INDICTMENT  
- v. - : 20 Cr.  
BAUDILIO REYES, :  
RONALD WILLIAMS, :  
MIGUEL ANGEL GONZALEZ, and :  
ALFREDO ROJAS, :  
a/k/a "Wilfredo Nazario Roman," :  
a/k/a "Pedro," :  
Defendants. :  
- - - - - X

20 CRIM 507

COUNT ONE  
(Narcotics Conspiracy)

The Grand Jury charges:

1. In or about July 2020, in the Southern District of New York and elsewhere, BAUDILIO REYES, RONALD WILLIAMS, MIGUEL ANGEL GONZALEZ, and ALFREDO ROJAS, a/k/a "Wilfredo Nazario Roman," a/k/a "Pedro," the defendants, and others known and unknown, intentionally and knowingly did combine, conspire, confederate, and agree together and with each other to violate the narcotics laws of the United States.

2. It was a part and an object of the conspiracy that BAUDILIO REYES, RONALD WILLIAMS, MIGUEL ANGEL GONZALEZ, and ALFREDO ROJAS, a/k/a "Wilfredo Nazario Roman," a/k/a "Pedro," the defendants, and others known and unknown, would and did distribute and possess with intent to distribute a controlled substance, in

violation of Title 21, United States Code, Section 841(a)(1).

3. The controlled substance that BAUDILIO REYES, RONALD WILLIAMS, MIGUEL ANGEL GONZALEZ, and ALFREDO ROJAS, a/k/a "Wilfredo Nazario Roman," a/k/a "Pedro," the defendants, conspired to distribute and possess with intent to distribute was five kilograms and more of mixtures and substances containing a detectable amount of cocaine, in violation of Title 21, United States Code, Section 841(b)(1)(A).

(Title 21, United States Code, Section 846.)

COUNT TWO  
(Firearms Offense)

The Grand Jury further charges:

4. On or about July 29, 2020, in the Southern District of New York and elsewhere, RONALD WILLIAMS and MIGUEL ANGEL GONZALEZ, the defendants, during and in relation to a drug trafficking crime for which they may be prosecuted in a court of the United States, namely, the narcotics conspiracy charged in Count One of this Indictment, knowingly did use and carry a firearm, and, in furtherance of such crime, did possess a firearm, and did aid and abet the use, carrying, and possession of a firearm.

(Title 18, United States Code, Sections 924(c) and 2.)

COUNT THREE  
(Felon in Possession)

The Grand Jury further charges:

5. On or about July 29, 2020, in the Southern District of

New York and elsewhere, RONALD WILLIAMS, the defendant, knowing that he had previously been convicted in a court of a crime punishable by imprisonment for a term exceeding one year, knowingly did possess, in and affecting commerce, a firearm, to wit, a Glock 27 .40 caliber semi-automatic pistol, which previously had been shipped and transported in interstate and foreign commerce.

(Title 18, United States Code, Section 922(g)(1).)

FORFEITURE ALLEGATION

6. As a result of committing the offense alleged in Count One of this Indictment, BAUDILIO REYES, RONALD WILLIAMS, MIGUEL ANGEL GONZALEZ, and ALFREDO ROJAS, a/k/a "Wilfredo Nazario Roman," a/k/a "Pedro," the defendants, shall forfeit to the United States, pursuant to Title 21, United States Code, Section 853, any and all property constituting, or derived from, any proceeds obtained, directly or indirectly, as a result of said offense and any and all property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, said offense, including but not limited to a sum of money in United States currency representing the amount of proceeds traceable to the commission of said offense.

Substitute Assets Provision

7. If any of the above-described forfeitable property, as a result of any act or omission of the defendants:
- a. cannot be located upon the exercise of due diligence;
  - b. has been transferred or sold to, or deposited with, a third person;
  - c. has been placed beyond the jurisdiction of the Court;
  - d. has been substantially diminished in value; or
  - e. has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendants up to the value of the above forfeitable property.

(Title 21, United States Code, Section 853.)

Leenie Boelman  
FOREPERSON

Audrey Strauss  
AUDREY STRAUSS  
Acting United States Attorney

Form No. USA-33s-274 (Ed. 9-25-58)

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a/k/a "Pedro,"

Defendants.

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INDICTMENT

20 Cr.

(21 U.S.C. §§ 846, 853; 18 U.S.C.  
§§ 924(c), 922(g)(1), 2.)

AUDREY STRAUSS  
Acting United States Attorney

Deonie Boulam  
Foreperson

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